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Attorneys for Official Committee of  
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**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re:  
**2<sup>ND</sup> CHANCE INVESTMENT GROUP, LLC,**  
  
Debtor and Debtor-in-  
possession.

Case No. 8:22-bk-12142-SC

Chapter 11 Proceeding

**RESPONSE OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS TO THE STIPULATION  
BETWEEN THE DEBTOR AND  
SALVADOR JIMENEZ RESOLVING  
THE DEBTOR’S FIRST OMNIBUS  
OBJECTIONS TO CLAIMS**

Date: May 31, 2023

Time: 1:30 p.m.

Place: United States Bankruptcy Court 411  
West Fourth Street, Suite 5130 / Courtroom 5C  
(via zoom) Santa Ana, CA 92701-4593

The Official Committee of Unsecured Creditors (“Committee”) for the above-referenced bankruptcy estate (“Estate”) of 2nd Chance Investment Group, LLC, the Debtor and Debtor-in-Possession (“Debtor”), hereby responds to the *Stipulation Between the Debtor and Salvador Jimenez Resolving the Debtor’s First Omnibus Objections to Claims* [Docket No. 116] (“Claims Stipulation”).

Pursuant to *the Stipulation Between Debtor and the Official Committee of Unsecured Creditors Granting the Committee Standing to Pursue Certain Avoidance Actions on Behalf of the*

1 *Estate* [Docket No. 73], the Committee is investigating the claims of Salvador Jimenez that are the  
2 subject of the Claims Stipulation (“Jimenez Claims”) and payments or transfers received by Mr.  
3 Jimenez from the Debtor.

4 The Committee does not object to approval of the Claims Stipulation insofar as it resolves  
5 the status of the Jimenez Claims as unsecured. The Committee reserves its right to raise any other  
6 objection to the Jimenez Claims, including but not limited to any objection that the Jimenez Claims  
7 are subject to disallowance under Section 502(d) of the Bankruptcy Code.

8  
9 Respectfully submitted,

10 Dated: May 17, 2023

**GOE FORSYTHE & HODGES LLP**

11  
12 By: /s/ Robert P. Goe  
13 Robert P. Goe  
14 Charity J. Manee  
15 Counsel for the Official Committee of  
16 Unsecured Creditors  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 17701 Cowan, Bldg. D, Suite 210, Irvine, CA 92614

A true and correct copy of the foregoing document entitled (*specify*): **RESPONSE OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE STIPULATION BETWEEN THE DEBTOR AND SALVADOR JIMENEZ RESOLVING THE DEBTOR'S FIRST OMNIBUS OBJECTIONS TO CLAIMS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) May 17, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) May 17, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows: Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** (*state the method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) May 17, 2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows: Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

- The Honorable Scott C. Clarkson, 411 W. Fourth Street, Suite 5130; Santa Ana, CA 92701-4593
- (SUSPENDED DUE TO COVID-19 PROTOCOLS)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 17, 2023    Kerry A. Murphy  
*Date*                      *Printed Name*

/s/Kerry A. Murphy  
*Signature*

## Mailing Information for Case 8:22-bk-12142-SC

### Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Amanda G. Billyard** abillyard@bwlawcenter.com
- **Stephan M Brown** ECF@thebklawoffice.com, stephan@thebklawoffice.com;roslyn@thebklawoffice.com
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- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

### Manual Notice List

The following is the list of **parties** who are **not** on the list to receive email notice/service for this case (who therefore require manual noticing/service). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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